Remarks/Arguments

Claims 1 - 13 are pending. Claims 4, 7 and 13 have been amended without prejudice herein.

Objections to the Drawings and Specification

The drawings stand objected to under 37 CFR 1.83(a). The present Office action argues the limitation of Claim 10 ("the cells are micromirrors of a micromirror circuit") must be shown or the feature(s) cancelled from the claims. The specification stands objected to as failing to provide proper antecedent basis for the claimed subject matter. The present Office action argues that no details of implementation of Claim 10 ("the cells are micromirrors of a micromirror circuit") are shown in the specification. And, that "Notice that operation of micro mirror circuit is different from PDP." *7/29/2004 Office action, par. 2.* Applicant respectfully traverses these objections, and requests their reconsideration and removal for at least the following reasons.

Claims 1 and 10 of the present application are directed to addressing cells arranged as a matrix array. Applicant submits that the present invention as claimed is equally applicable to addressing micromirrors and PDP's, regardless of whether operation of micro mirror circuits and PDP's are different. By way of non-limiting example only, support for this may be found in the present specification, beginning with the last paragraph on page 24, wherein it recites:

> [The invention] may be applied equally to any type
> of screen or device with matrix addressing which utilized
> modulation of the temporal type for the displaying of
> luminance or grey levels corresponding to each of three
> components R G B. The cells of this device or matrix

array with line inputs and column inputs, here the term cell being taken in the broad sense of elements at the intersection of the lines and columns, may be cells of plasma panels or else micromirrors of micromirror circuits. Instead of emitting light directly, these micromirrors reflect received light in a pointwise manner (a cell corresponding to a micromirror), when they are selected. Their addressing in respect of selection is then identical to the addressing of the cells of plasma panels such as is described in the present application.

With regard to the drawings, Applicant respectfully submits as the method of addressing is equally applicable to PDP's and micromirrors, the present figures fully satisfy the requirements of 37 CFR 1.83(a). Nonetheless, specific reference may be made to Figure 9, which shows a simplified chart of control circuits of a panel 18 according to an embodiment of the present invention. As set forth on pages 24 – 25 of the present specification, the addressing of micromirrors in respect of selection is identical to the addressing of the cells of panels. Thus, Applicant submits a detailed illustration showing the cells of micromirrors of a micromirror circuit is not required in view of the illustration of Figure 9 showing a panel, as it is not essential for a proper understanding of the invention. *See, 37 CFR 1.83(a)*.

Wherefore, Applicant respectfully requests reconsideration and removal of the present objections to the drawings and specification.

Claim Objections

Applicant acknowledges the indication in the present Office action that while Claims 4, 7 and 13 stand objected to as depending from a rejected base claim, these claims would be allowable if rewritten in independent form including all of the

limitations of the base claim and any intervening claims. Applicant has amended Claims 4, 7 and 13 to be independent in form and include all of the limitations of the claims upon which they depend. Accordingly, Applicant respectfully requests allowance of Claims 4, 7 and 13.

35 U.S.C. §103(a) Rejections

Claims 1 - 3, 9, and 11 - 12 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Saegusa (United States Patent No. 5,475,448) in view of Van Dijk (United States Patent No. 6,424,325). Claims 5 - 6 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Saegusa and Van Dijk and further in view of Inoue (United States Patent No. 5,646,646). Claim 8 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Saegusa and Van Dijk, and further in view of Sakoda (United States Patent No. 5,559,954). Claim 9 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Saegusa and Van Dijk, and further in view of Nelson (United States Patent No. 5,771,060). Applicant respectfully traverses these rejections for at least the following reasons.

To establish a prima facie case of obviousness, all of the recited claim limitations must be taught or suggested in the prior art. *See, MPEP 2143.03; see also, In re. Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974).* Applicant respectfully submits the cited prior art references, singly and in combination, fail to teach or suggest all of the limitations of each of the pending claims.

For example, Claim 1 recites, in part:

> A method for addressing cells arranged as a matrix array,
> ... wherein a different coding of the column control words is

> performed depending on whether the word relates to an
> even or odd line, ... so as to obtain writing instants which
> are substantially different from one line to the next.

Applicant respectfully submits the cited art fails to teach or suggest at least these limitations.

First, Applicant submits the present Office action admits Saegusa fails to teach or suggest this limitation, in as much as it admits,

> "Saegusa does not show a different coding of the column control words is performed depending on whether the word relates to an even or odd line, this difference consisting in the fact that at least m successive bits of specified ranks have different weights from one control word to the other, the sum of the weights of these bits remaining identical from one control word to the other, so as to obtain writing instants which are substantially different from one line to the next". *7/29/2004 Office action, page 4, lines 10-15.*

The present Office action attempts to rely upon Van Dijk and its teachings with regard to Figures 6A and 6B thereof to remedy the admitted shortcoming of Saegusa. *See, 7/29/2004 Office action, page 4, line 16 – page 5, line 3.*

However, Van Dijk <u>does not teach a method wherein the writing instants are substantially different from one line to the next</u> – as is explicitly recited in Claim 1. Figures 6A and 6B of Van Dijk show schematic representations of the address periods Tp, Bx. *See, Van Dijk, col. 8, lines 29 – 30.* Figures 6A and 6B of Van Dijk show a method wherein the cells of the line m-1 (Fig.6A) and the line m (Fig.6B) are addressed during the same period Tp,bx. More specifically, Tp,b5 of Fig. 6A is simultaneous to Tp,b0 of Fig.6B; Tp,b4 of Fig.6A is simultaneous to Tp,b2 of Fig.6B; Tp,b3 of Fig. 6A is simultaneous to Tp,b1 of Fig. 6B; Tp,b2 of Fig. 6A is simultaneous to Tp,b5 of Fig. 6B;

Tp,b1 of Fig. 6A is simultaneous to Tp,b4 of Fig. 6B; and Tp,b0 of Fig. 6A is simultaneous to Tp,b3 of Fig.6B.

Therefore, the writing instants of the cells of Van Dijk are <u>not</u> substantially different from one line (line m-1) to the next line (line m). Rather, <u>successive lines are addressed simultaneously</u> according to Van Dijk. Accordingly, Applicant respectfully submits Van Dijk, like Saegusa, also fails to teach or suggest "[a] method for addressing cells arranged as a matrix array, ... wherein a different coding of the column control words is performed depending on whether the word relates to an even or odd line, ... so as to obtain writing instants which are substantially different from one line to the next."

Thus, as Saegusa and Van Dijk each fails to teach or suggest at least the above-identified limitation of Claim 1, clearly their combination also fails to teach or suggest such features as well. Wherefore Applicant respectfully requests reconsideration and removal of the rejection of Claim 1 for at least the foregoing reasons. Applicant also respectfully requests reconsideration and removal of the rejections of Claims 2, 3, 5, 6 and 8 – 10, at least by virtue of these Claims' ultimate dependency from patentably distinct base Claim 1.

Applicant respectfully requests reconsideration and removal of the rejection of Claim 11 also, at least by virtue that it analogously recites, in part,

> wherein the video processing and transcoding circuits perform a different coding of the column control words depending on whether the word relates to an even or odd line, this difference consisting in the fact that at least m successive bits of specified ranks from among the bits to be transmitted, m being between 2 and n, have different weights from one control word to the other, the sum of the

weights of these bits remaining identical from one control word to the other, so as to obtain writing instants which are substantially different from one line to the next.
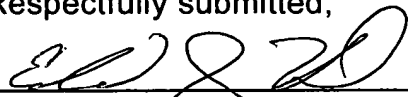
Applicant also requests reconsideration and removal of the rejection of Claim 12, at least by virtue of this Claim's ultimate dependency from patentably distinct base Claim 11.

CONCLUSION

Wherefore, Applicant believes he has addressed all outstanding grounds raised by the Examiner and respectfully submits the present case is in condition for allowance, early notification of which is earnestly solicited.

Should there be any questions or outstanding matters, the Examiner is cordially invited and requested to contact Applicant's undersigned attorney at his number listed below.

Respectfully submitted,

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